

EXHIBIT 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LOGAN PAUL

Plaintiff,

v.

STEPHEN FINDEISEN and COFFEE
BREAK PRODUCTIONS, LLC,

Defendants.

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Civil Action No. 5:24-CV-00717

**DEFENDANT STEPHEN FINDEISEN'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S SECOND SET OF INTERROGATORIES**

TO: Plaintiff Logan Paul, by and through his attorneys of record, Andrew C. Phillips and Shannon B. Timmann; MEIER WATKINS PHILLIPS PUSCH, LLP, 919 18th Street NW, Suite 650, Washington, DC 20006, Jeffrey A. Neiman and Jason L. Mays; MARCUS NEIMAN RASHBAUM & PINEIRO, LLP, 100 SE 3rd Ave., Suite 805, Ft. Lauderdale, Florida 33394, and Ricardo G. Cedillo; DAVIS, CEDILLO & MENDOZA, INC., 755 E. Mulberry Ave., Suite 250, San Antonio, Texas 78212

Pursuant to Federal Rule of Civil Procedure 26 and 33, Defendant Stephen Findeisen serves these Responses to Plaintiff's Second Set of Interrogatories.

Dated: March 14, 2025.

Respectfully submitted,

DAVIS & SANTOS, PLLC

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*Attorneys for Defendants Stephen Findeisen
and Coffee Break Productions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2025, the foregoing document was served on all counsel of record as follows:

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Attorneys for Plaintiff Logan Paul

/s/ Caroline Newman Small
Caroline Newman Small

INTERROGATORY NO. 10: Please state whether you have ever been retained as an expert, whether testifying or non-testifying, in any legal proceeding involving Mr. Paul. If you have been retained as an expert in any legal proceeding involving Mr. Paul, for each proceeding please (a) identify the proceeding by case name and number and state which party or parties retained you; (b) state the date you were retained; (c) describe the scope of your engagement, including if applicable matters on which you have been retained to testify; (d) state the hourly fee you are charging for your services or, if you are not charging an hourly fee, describe the financial terms of your retention; and (e) state the total amount that you have been compensated to date pursuant to that expert retention.

RESPONSE:

Mr. Findeisen objects to this request on the grounds of work-product privilege and the privileges afforded under Fed. R. Civ. P. 26(b)(4)(D), and further because a Motion for Protection has been filed by Tommy Kherkher regarding this subject matter. *See* ECF No. 58.

Subject to and without waiving the forgoing objections, Mr. Findeisen refers Plaintiff to his declaration dated February 14, 2025, previously provided to counsel.

INTERROGATORY NO. 11: Please state whether you have ever been retained as an expert witness in any legal proceeding aside from legal proceedings involving Mr. Paul. If you have been retained as an expert witness in any such legal proceeding, for each proceeding please (a) identify the proceeding by case name and number and state which party or parties retained you; (b) state the date you were retained; (c) describe the scope of your engagement, including if applicable matters on which you have been retained to testify; (d) state the hourly fee you charged/are charging for your services or, if there was no hourly fee, describe the financial terms of your retention; and (e) state the total amount that you have been compensated to date pursuant to that expert retention.

RESPONSE:

Mr. Findeisen objects to this request on the grounds of work-product privilege and the privileges afforded under Fed. R. Civ. P. 26(b)(4)(D). Subject to and without waiving the forgoing objection, Mr. Findeisen states that he has not been retained as a testifying expert pursuant to Fed. R. Civ. P. 26(b)(4)(A).

DECLARATION

My name is Stephen Findeisen, and I have read Defendant Stephen Findeisen's Responses and Objections to Plaintiff's Second Set of Interrogatories. Pursuant to Rule 33(b)(1)(A) of the Federal Rules of Civil Procedure, and pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the factual responses given therein are true and correct to the best of my knowledge, information, recollection, and belief.

Executed on March 13th, 2025.

Stephen Findeisen

Stephen Findeisen